

TIMOTHY A. JACKSON

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**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA**

TIMOTHY A. JACKSON

Pro Se Plaintiff,

VS

a foreign limited liability company,

EQUIFAX INFORMATION SERVICES LLC,

TRANSUNION LLC, AND WELLS FARGO

HOME MORTGAGE, DIRECTORS AND

INSURANCE COMPANY,

Defendant,

COMPLAINT

Fair Credit Reporting Act (15 U.S.C. § 1681)

Fair Debt Collection Practices Act,

Defamation, Negligence,

Demand for Jury Trial

Plaintiff alleges that at all times material are true facts:

1.

This is a civil action brought under Fair Credit Reporting Act 15 U.S.C. § 1681, Fair Debt Collection Practices Act, Defamation, Infliction of High Emotional Distress, Negligence, Intentionally and Willfully Violation of FCRA Law.

Wells Fargo Home Mortgage and Directors and Insurance Company, Transunion LLC, and Equifax Information Services LLC knowingly and willfully after numerous disputes failed and refused to update, investigate, and correct both of Timothy A. Jackson Wells Fargo Home Mortgage misreporting, inaccurate, and false 81 month payment credit history and

insufficient mortgage information on both of Timothy A. Jackson Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

The Honorable Court has jurisdiction pursuant to FCRA 15 U.S.C. § 1681 Law and all claims listed above.

2.

Plaintiff Timothy A Jackson ("Plaintiff") is a natural person residing in the State of South Carolina, as defined by the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681 a(c), Fair Debt Credit Protection Act ("FDCPA"), Defamation, Infliction of High Emotional Distress, Negligence, Willful and Intentional violation under FCRA Law.

3.

Equifax Information Services, LLC ("Equifax" or "Defendant") and Transunion LLC ("Transunion" or "Defendant") is a consumer reporting agency as defined by the FCRA, 15 U.S.C. § 1681 Law, Negligence, Infliction of High Emotional Distress, Defamation and Willful and Intentional violation under FCRA Law.

Wells Fargo Home Mortgage and Directors and Insurance Company ("Wells Fargo or Defendant") is a home mortgage company user and furnisher as defined by FCRA Law, Negligence, and Defamation, FDCPA Law, Infliction of High Emotional Distress, Willful and Intentional Violation under FCRA Law.

Pursuant to FCRA, 15 U.S.C. § 1681 Law; Wells Fargo, Equifax, and Transunion failed and refuse to update, investigate, and correct both of Plaintiff's Wells Fargo Home Mortgage misreporting, false, and inaccurate 81month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

4.

On or about December 28, 2017, Plaintiff received a Navy Federal Home Improvement Equity Loan with higher mortgage interest rate and hard credit inquiry due to both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report.

5.

On or about January 23, 2018, the Plaintiff requested copy of both Wells Fargo Home Mortgage Equifax and Transunion credit report. The Plaintiff's Wells Fargo Home Mortgage Transunion and Equifax credit report contained misreporting, false, and inaccurate 81 month credit reporting payment history on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage

information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report.

6.

On or about January 26, 2018, Plaintiff went in good faith to Wells Fargo Home Mortgage Office located in Greenwood S.C 29649 to dispute both of Plaintiff's misreporting, false, and inaccurate 81month credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report. The Plaintiff spoke with Wells Fargo Home Mortgage Banker Ms. Megan Anderson to update and correct both of Plaintiff's misreporting, false, and inaccurate 81month credit reporting payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report. Ms. Anderson acknowledged there was problem and error with Plaintiff's Wells Fargo Home Mortgage 81 month payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; Ms. Anderson faxed to Wells Fargo Home Mortgage Corporate Office the Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report and also typed a letter on the Plaintiff's behalf asking Wells Fargo Home Mortgage and Directors in good faith to update and correct Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report. Equifax, Transunion, and Wells Fargo Home Mortgage and Directors did not conduct a reasonable investigation of Plaintiff's dispute. (FIRST DISPUTE) (Refer to Plaintiff's Exhibit A, B, and C etc.)

On or about February 13, 2018, Wells Fargo Home Mortgage and Directors, Transunion and Equifax failed and refused to reasonably investigate, update, and correct both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

7.

On or about March 7, 2018, Plaintiff filed another dispute in good faith with Wells Fargo Home Mortgage and Directors Ms. Katrina Wilkerson to update and correct both of Plaintiff's misreporting, false, and inaccurate 81 month credit reporting payment history on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Transunion and Equifax Credit Report. (SECOND DISPUTE) (Refer to Plaintiff's Exhibit A, B, and C etc.)

On or about March 21, 2018, Wells Fargo Home Mortgage and Directors, Transunion and Equifax failed and refused to reasonably investigate, update, and correct both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

8.

On or about April 11, 2018, Plaintiff filed another dispute in good faith with Wells Fargo Home Mortgage and Directors Mr. Justin Kapp to update and correct both of Plaintiff's misreporting, false, and inaccurate 81 month credit reporting payment history on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report. (Third Dispute) (Refer to Plaintiff's Exhibit A, B, and C etc.)

On or about April 26, 2018, Wells Fargo Home Mortgage and Directors, Transunion and Equifax failed and refused to reasonably investigate, update, and correct both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

9.

On or about May 7, 2018, Plaintiff was offered a higher Quicken Loans Refinance Home Mortgage Rate and hard credit inquiry due to both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report.

On or about May 8, 2018, Plaintiff was offered a higher Wells Fargo Refinance Home Mortgage Rate and hard credit inquiry due to both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report.

On or about May 15, 2018, Plaintiff was offered a higher Navy Federal Credit Union Refinance Home Mortgage Rate and hard credit inquiry due to both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report.

10.

On or about May 16, 2018, Plaintiff filed another dispute in good faith by sending a certified letter to Wells Fargo Home Mortgage and Directors, Equifax and Transunion to update and correct both of Plaintiff's misreporting, false, and inaccurate 81 month credit reporting payment history on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report. (Fourth Dispute) (Refer to Plaintiff's Exhibit A, B, C, D, and E etc.)

On or about August 21, 2018, Wells Fargo Home Mortgage and Directors, Transunion and Equifax failed and refused to reasonably investigate, update, and correct both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

11.

On about June 14, 2018, Plaintiff filed another dispute Complaint with Better Business Bureau ("BBB") to update and correct both of Plaintiff's misreporting, false, and inaccurate 81 month credit reporting payment history on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report. (Fifth Dispute) (Refer to Plaintiff's Exhibit A, B, C, D, and E etc.)

On or about August 21, 2018, Wells Fargo Home Mortgage and Directors, Transunion and Equifax failed and refused to reasonably investigate, update, and correct both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

12.

On or about June 16, 2018, Plaintiff filed another dispute in good faith Complaint with Consumer Financial Protection Bureau ("CFPB") to update and correct both of Plaintiff's

misreporting, false, and inaccurate 81 month credit reporting payment history on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax, Transunion, and Experian Credit Report. (Sixth Dispute) (Refer to Plaintiff's Exhibit A, B, C, D, and E etc.)

On or about August 21, 2018, Wells Fargo Home Mortgage and Directors, Transunion and Equifax failed and refused to reasonably investigate, update, and correct both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

13.

On or about July 3, 2018, Plaintiff filed another dispute in good faith by sending a certified letter to Wells Fargo Home Mortgage and Directors, Equifax, and Transunion to update and correct misreporting, false, and inaccurate 81 month credit reporting payment history on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report. (Seventh Dispute) (Refer to Plaintiff's Exhibit A, B, C, D, and E etc.)

On or about 8/28/2018, Wells Fargo Home Mortgage and Directors, Transunion and Equifax failed and refused to reasonably investigate, update, and correct both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

14.

On or about July 18, 2018, to present Plaintiff joined Credit Karma and filed numerous disputes online with Wells Fargo Home Mortgage and Directors, Equifax and Transunion to update and correct both of Plaintiff's misreporting, false, and inaccurate 81 month credit

reporting payment history on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report. (Eighth Dispute) (Refer to Plaintiff's Exhibit A, B, C, D, and E etc.)

On or about 8/28/2018, Wells Fargo Home Mortgage and Directors, Transunion and Equifax failed and refused to reasonably investigate, update, and correct both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

15.

On or about August 07, 2018, the Plaintiff was offered a higher Capital One Credit Card Rate and hard credit inquiry due to both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report.

16.

On or about September 09, 2018, Plaintiff in good faith tried to file another dispute with Wells Fargo Home Mortgage and Directors, Transunion, and Equifax by phone; however Wells Fargo, Equifax, and Transunion refused to allow the Plaintiff the right under FCRA 15 U.S.C. § 1681 Law to file another dispute to update and correct both of Plaintiff's misreporting, false, and inaccurate 81 month credit reporting payment history on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report. (Ninth Dispute) (Refer to Plaintiff's Exhibit A, B, C, D, and E etc.)

On or about September 09, 2018, Defendant Wells Fargo Home Mortgage and Directors, Transunion, and Equifax stated "Plaintiff could no longer dispute both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage

information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present".

17.

On or about October 09, 2018 to April 01, 2019, Plaintiff joined and paid Lexington Law Firm Credit Repair monthly who guaranteed they would get Plaintiff's Wells Fargo Home Mortgage 81 month misreporting, false, and inaccurate credit reporting payment history and insufficient mortgage information corrected on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however Lexington Law Firm Credit Repair did not update nor fix both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report. Lexington Law Firm Credit Repair filed numerous disputes on the Plaintiffs behalf with Wells Fargo Home Mortgage and Directors, Equifax and Transunion to update and correct both of Plaintiff's misreporting, false, and inaccurate 81 month credit reporting payment history and insufficient information on both of Plaintiff's Wells Fargo Home Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff's payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report. (Tenth Dispute) (Refer to Exhibit A, B, C, D, and E etc.)

On or about April 01, 2019, Plaintiff cancelled Lexington Law Firm Credit Repair due the fact Wells Fargo Home Mortgage and Directors, Transunion, and Equifax failed and refused to reasonably investigate, update, and correct both of Plaintiff's misreporting, false, and inaccurate 81 month payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report; however the Wells Fargo, Equifax, and Transunion continued reporting false, misreporting, and inaccurate 81 month payment credit payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present.

18.

On or about April 05, 2019, Plaintiff was denied credit and received a hard credit inquiry from United Community Bank due to both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report.

19.

On or about April 23, 2019, Plaintiff had no other choice and was forced to pay a lawyer and consultation fees seeking help to get Equifax, Transunion, and Wells Fargo Home Mortgage and Directors to update and correct both of Plaintiff's misreporting, false, and inaccurate 81 month credit reporting payment history on both of Plaintiff's Wells Fargo Home

Mortgage Loan, inaccurate high balance and fees, reporting old debt as new, wrong account type, incorrect credit limit, late payment after account was closed, inaccurate date of last payment, inaccurate date of last update, inaccurate reporting date, inaccurate account number, not applying Plaintiff payments correctly, inaccurate length of credit history, and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit Report.

20.

Wells Fargo Home Mortgage and Directors and Insurance Company, Transunion LLC, and Equifax Information Services LLC knowingly and willfully after numerous disputes failed and refused to investigate, update, and correct both of Plaintiff's Wells Fargo Home Mortgage misreporting, false, and inaccurate 81 moth payment credit history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present. After approximately two years of disputing saga and infliction of high emotional stress, Plaintiff gave up and filed lawsuit.

FIRST CLAIM FOR RELIEF

(FCRA-15 U.S.C. § 1681 n)

21.

Plaintiff realleges Paragraphs 1-20 as if fully set forth herein.

22.

Equifax, Transunion, and Wells Fargo Home Mortgage and Director and Insurance Companies willfully failed to comply with the requirements imposed under the FCRA 15 U.S.C. § 1681 Law, including but not limited to:

- a) Failing to follow reasonable procedures to assure maximum possible accuracy of the information in consumer reports, as required by FCRA 15 U.S.C. § 1681 e(b);**
- b) Failing to comply with the reinvestigation requirements in 15 U.S.C. § 1681i;**
- c) Providing Plaintiff's credit file to companies without determining that these companies had a permissible purpose to obtain Plaintiff's credit file pursuant to U.S.C. § 1681b**
- d) Failing to provide Plaintiff's his credit file pursuant to FCRA 15 U.S.C. § 1681g and**
- e) Negligence**

23.

As a result of Equifax, Transunion, Wells Fargo Home Mortgage, and Directors and Insurance Companies violations of the FCRA Law, Negligence, Defamation, FDCPA Law, Intentional and Willful violation of FCRA law; however Plaintiff has suffered, continues to suffer, and will suffer future damages, including denial of credit, lost opportunity to receive credit, damage to reputation, worry, infliction of high emotional distress, frustration,

embarrassment, and humiliation, all to his damages, in an amount to be determined by the Jury.

24.

Plaintiff is entitled to punitive damages in an amount to be determined by the Jury.

25.

Plaintiff is entitled to actual damages in an amount to be determined by the Jury in addition to any statutory damages in an amount to be determined by the Honorable Court.

26.

Plaintiff is entitled to his attorney fees, pursuant to FCRA 15 U.S.C. § 1681n(a) to be determined by Jury

SECOND CLAIM FOR RELIEF

(FCRA-15 U.S.C. § 1681o)

27.

Plaintiff realleges Paragraphs 1-20 as if fully set forth herein.

28.

Equifax, Transunion, and Wells Fargo Home Mortgage and Directors and Insurance Companies negligently failed to comply with the requirements imposed under the FCRA Law, including but not limited to:

- a) Failing to follow reasonable procedures to assure maximum possible accuracy of the information in consumer reports, as required by 15 U.S.C. § 1681e(b);
- b) Failing to comply with the reinvestigation requirements in 15 U.S.C. § 1681i;
- c) Providing Plaintiff's credit file to companies without determining that these companies had a permissible purpose to obtain Plaintiff's credit file pursuant to U.S.C. § 1681b
- d) Failing to provide Plaintiff's his credit file pursuant to 15 U.S.C. § 1681g and
- e) Negligence

29.

As a result of Equifax, Transunion, Wells Fargo Home Mortgage, and Directors and Insurance Companies violations of the FCRA Law, Defamation, Negligence, FDCPA Law, Intentional and Willful violation of FCRA Law; Plaintiff has suffered, continues to suffer, and will suffer future damages, including denial of credit, lost opportunity to receive credit, damage to reputation, worry, distress, frustration, embarrassment, and humiliation, all to his damages, in an amount to be determined by the Jury.

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30.

Plaintiff is entitled to actual damages in an amount to be determined by the Jury.

31.

Plaintiff is entitled to his attorney fees, pursuant to 15 U.S.C. § 1681o(a) to be determined by Jury.

Third Claim For Relief

32.

On Plaintiff's Third Claim for Defamation Relief violations against the Defendant Equifax, Transunion, and Wells Fargo Home Mortgage, and Directors and Insurance Company:

- a) **False, Misreporting, Inaccurate, and defamatory statements concerning both of the Plaintiff's Wells Fargo Home Mortgage 81 month misreporting, false, and inaccurate credit reporting payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit report from December 28, 2017 to present to be Determined by Jury;**
- b) **Equifax, Transunion, and Wells Fargo Home Mortgage made unprivileged false, inaccurate, and misreporting on both of the Plaintiff's Wells Fargo Home Mortgage 81 month credit reporting payment history and insufficient mortgage information publication to a third party concerning both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present to be determined by Jury.**

33.

Fourth Claim For Relief

4. On Plaintiff's Fourth Claim for Injunctive Relief against Defendant Equifax, Transunion, and Wells Fargo Home Mortgage, and Directors and Insurance Company:

- a. **Injunctive Relief to update and correct both of Plaintiff's Wells Fargo Home Mortgage misreporting, false, and inaccurate 81 month credit reporting payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report once and for all from December 28, 2017 to present to be determined by Jury.**

34.

5. On all Claims for Relief, Costs, and Expenses incurred in this action to be determined by Jury and Honorable Court.

PRAYER

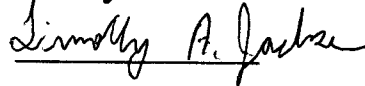
Plaintiff respectfully demands a Jury trial on all claims. Wherefore Plaintiff Timothy Jackson prays for a judgement as follows from the Honorable Court:

- 1. On Plaintiff's First Claim for Relief for Willful and Intentionally violations of the FCRA Law against Defendant Equifax, Transunion, and Wells Fargo Home Mortgage and Directors and Insurance Companies:**
 - a. Actual damages in amount to be determined by the Jury;**
 - b. Punitive damages in an amount to be determined by the Jury;**
 - c. Statutory damages as determined by the Honorable Court;**
 - d. Attorney fees and costs to be determined by Jury; and**
 - e. Negligence to be determined by Jury**
- 2. On Plaintiff's Second Claim for Relief for negligent violations of the FCRA Law against Defendant Equifax, Transunion, and Wells Fargo Home Mortgage and Directors and Insurance Companies:**
 - a. Actual damages in an amount to be determined by the Jury;**
 - b. Attorney fees and costs to be determined by Jury**
- 3. On Plaintiff's Third Claim for Relief for Defamation violations against Defendant Equifax, Transunion, and Wells Fargo Home Mortgage and Directors and Insurance Companies:**
 - a) False, Misreporting, Inaccurate, and defamatory statements concerning both of the Plaintiff's Wells Fargo Home Mortgage 81 month misreporting, false, and inaccurate credit reporting payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion Credit report from December 28, 2017 to present to be Determined by Jury;**
 - b) Equifax, Transunion, and Wells Fargo Home Mortgage made unprivileged false, inaccurate, and misreporting on both of the Plaintiff's Wells Fargo Home Mortgage 81 month credit reporting payment history and insufficient mortgage information publication to a third party concerning both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present to be determined by Jury.**

4. On Plaintiff's Fourth Claim for Injunctive Relief against Defendant Equifax, Transunion, and Wells Fargo Home Mortgage and Directors and Insurance Companies:
 - a. Injunctive Relief to update and correct both of Plaintiff's Wells Fargo Home Mortgage misreporting, false, and inaccurate 81 month credit reporting payment history and insufficient mortgage information on both of Plaintiff's Wells Fargo Home Mortgage Equifax and Transunion credit report from December 28, 2017 to present once and for all to be determined by Jury.
5. On ALL Claims for Relief, Costs and Expenses incurred in this action to be determined by Jury and the Honorable Court.

DATED this 19th day of December 2019.

Timothy A Jackson



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